

AKIN GUMP STRAUSS HAUER & FELD LLP

Ira S. Dizengoff

Philip C. Dublin

Abid Qureshi

One Bryant Park

New York, New York 10036

Telephone: (212) 872-1000

Facsimile: (212) 872-1002

Rachel Biblo Block (*pro hac vice* pending)

2300 N. Field St., Suite 1800

Dallas, Texas 75201

Telephone: (214) 969-2800

Facsimile: (214) 969-4343

*Proposed Counsel to the Official Committee
of Unsecured Creditors of Rudolph W. Giuliani*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re:	: Chapter 11
	:
RUDOLPH W. GIULIANI	: Case No. 23-12055 (SHL)
a/k/a RUDOLPH WILLIAM GIULIANI,	:
	:
Debtor.	:
-----X	

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF ALL NOTICES AND PAPERS**

PLEASE TAKE NOTICE that Akin Gump Strauss Hauer & Feld LLP (“Akin”) hereby appears in the above-captioned case of Rudolph W. Giuliani (the “Debtor”) as proposed counsel to the Official Committee of Unsecured Creditors (the “Committee”)¹ pursuant to section 1109(b)

¹ As will be set forth in Akin’s retention application and subject to approval of this Court, in recognition of the unique and important circumstances of this chapter 11 case, Akin has agreed to serve as counsel to the Committee on a *pro bono* basis, with one contingent qualification: Akin intends to reserve the right to seek allowance, under applicable provisions of the Bankruptcy Code, Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and orders of this Court, of all actual, reasonable and necessary fees and expenses incurred in connection with its representation of the Committee in the event that the Debtor obtains confirmation of a chapter 11 plan or other resolution of the chapter 11 case that is not supported by the Committee. In that event, it is Akin’s intention that all of Akin’s fees and expenses approved by the Court and paid by the Debtor’s estate to Akin in connection with its engagement by the Committee be contributed to the Debtor’s unsecured creditors.

of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and respectfully requests, pursuant to Bankruptcy Rules 2002 and 9007, that all notices given or required to be given in this chapter 11 case and all papers served or required to be served in this case be given to and served upon the following:

AKIN GUMP STRAUSS HAUER & FELD LLP

Ira S. Dizengoff
Philip C. Dublin
Abid Qureshi
One Bryant Park
New York, NY 10036
Telephone: (212) 872-1000
Facsimile: (212) 872-1002
Email: idizengoff@akingump.com
Email: pdublin@akingump.com
Email: aqureshi@akingump.com

- and -

Rachel Biblo Block
2300 N. Field St., Suite 1800
Dallas, TX 75201
Telephone: (214) 969-2800
Facsimile: (214) 969-4343
Email: rbibloblock@akingump.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Bankruptcy Code section 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, notices of any application, complaint, demand, hearing, motion, petition, order, pleading or other request, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, electronic mail or otherwise, that is filed or given in connection with the above-captioned case.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed or construed to be a waiver of any substantive or procedural rights of the Committee, including, without limitation: (i) to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the Southern District of New York (the “District Court”); (ii) to have a trial by jury in any proceeding related to this case or any case, controversy or proceeding related to this case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; and (iv) any other rights, claims, actions or defenses to which the Committee may be entitled in law, in equity, or otherwise, all of which rights, claims, actions and defenses are expressly reserved.

PLEASE TAKE FURTHER NOTICE that the aforementioned attorneys request that they be added to the official service list for notice of all contested matters, adversary proceedings and other proceedings in this case.

[Remainder of Page Intentionally Left Blank]

Dated: January 18, 2024
New York, New York

/s/ Ira S. Dizengoff

AKIN GUMP STRAUSS HAUER & FELD LLP

Ira S. Dizengoff
Philip C. Dublin
Abid Qureshi
One Bryant Park
New York, New York 10036
Tel: (212) 872-1000
Fax: (212) 872-1002
Email: idizengoff@akingump.com
pdublin@akingump.com
aqureshi@akingump.com

- and -

Rachel Biblo Block (*pro hac vice* pending)
2300 N. Field St., Suite 1800
Dallas, Texas 75201
Tel: (214) 969-2800
Fax: (214) 969-4343
Email: rbibloblock@akingump.com

*Proposed Counsel to the Official Committee
of Unsecured Creditors of Rudolph W. Giuliani*